

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-  
Form Complaint and:

Robert Massey, et al. v. National Football  
League, et al. (Plaintiff Keith Wagner  
ONLY)

Court File No. 2:12-cv-6069-AB

**MOTION FOR LEAVE TO  
WITHDRAW AS COUNSEL  
FOR PLAINTIFF KEITH WAGNER**

J. Gordon Rudd, Jr., Brian C. Gudmundson, and Michael J. Laird of Zimmerman Reed LLP ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Keith Wagner only in this action, and state as follows:

1. Plaintiff's counsel filed the action *Robert Massey, et al. v. National Football League, et al.*, No. 2:12-cv-6069-AB, in the Eastern District of Pennsylvania on September 27, 2012, for the benefit of several retired National Football League players, including Keith Wagner.

2. Plaintiff's counsel filed a short form complaint for Keith Wagner on October 29, 2012.

3. Since then, irreconcilable differences have arisen between Plaintiff Keith Wagner and the undersigned.

4. Plaintiff's counsel properly notified Keith Wagner of counsel's intention to withdraw from representing him in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiff's counsel respectfully requests this Court for leave to withdraw as counsel for Keith Wagner only in Court File No. 2:12-cv-6069-AB.

Dated: October 21, 2019

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson

J. Gordon Rudd, Jr. (#222082)

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